

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER HOUGH, :
Plaintiff, : Civil Action No. 21-cv-04568
: (ENV) (JRC)
: REPLY DECLARATION OF
- against - : STEVEN D. ISSER
ONIKA TANYA MARAJ, AKA (“NICKI MINAJ”) :
and KENNETH PETTY, AKA (“ZOO”), :
Defendants. :
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STEVEN D. ISSER, declares under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to the Bar of this Court and am counsel to Defendant Kenneth Petty (“Defendant”) in the above-captioned action. I am fully familiar with the facts set forth below and I submit this Reply Declaration in further support of Defendant’s motion to vacate the Certificate of Default entered against Defendant, pursuant to Rule 55(c) of the Federal Rules of Civil Procedure.

2. Attached hereto as Exhibit (“Ex.”) 1 is a true and correct copy of the Declaration of Robert Diaz, sworn to on October 27, 2021 (the “Diaz Declaration” or “Diaz Decl.”), previously filed by Plaintiff in support of her motion for a default judgment.

3. Attached hereto as Ex. 2 is a true and correct copy of the Memorandum of Law of Defendant Kenneth Petty in Opposition to Plaintiff’s Motion for a Default Judgment, previously filed by Defendant in opposition to Plaintiff’s motion for a default judgment.

4. Attached hereto as Ex. 3 is a true and correct copy of the Declaration of Kenneth Petty, sworn to on November 5, 2021, previously filed by Defendant in opposition to Plaintiff’s motion for a default judgment.

5. Attached hereto as Ex. 4 is a true and correct copy of the Declaration of Steven D. Isser, sworn to on November 8, 2021, previously filed by Defendant in opposition to Plaintiff's motion for a default judgment.

6. Attached hereto as Ex. 5 is a true and correct copy of the transcript of an interview of Shiran Grayson, Plaintiff's cousin, on YouTube. The interview can be seen by clicking the link <https://www.youtube.com/watch?v=Y1QvfqUJ8s0>.

7. Judd Burstein, Esq. referred Defendant to me for representation and I was fully retained by Defendant the evening of October 20, 2021 and waited until I had completed drafting the motion papers to vacate the Certificate of Default before I filed a Notice of Appearance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 22nd day of November, 2021, in the State of New Jersey, County of Union.



Steven D. Isser